

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

MARK A. PETERSON,  
Plaintiff

v.

MASSACHUSETTS INSTITUTE OF  
TECHNOLOGY - LINCOLN LABORATORY,  
and  
RESEARCH DEVELOPMENT and  
TECHNICAL EMPLOYEES' UNION,  
Defendants

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C.A. NO. 04CV40148-FDS

U.S. DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

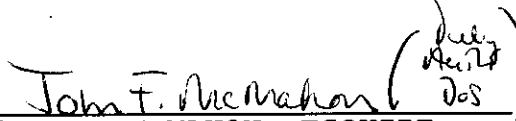
PARTIES PROPOSED PRE-TRIAL SCHEDULE  
PURSUANT TO FEDERAL RULES OF CIVIL  
PROCEDURE 26(f) AND LOCAL RULE 16.1(D)

The parties to the above-captioned matter, by and through their attorneys, hereby state that:

1. Pursuant to Federal Rules of Civil Procedure 26(f), Local Rule 16.1(B) and the Notice of Scheduling Conference dated June 2, 2005, they conferred for the purpose of:
  - a. Preparing a proposed pre-trial schedule for the case that includes a plan for discovery; and
  - b. Considering whether they will consent to trial by Magistrate Judge.
2. After consideration of the topics contemplated by Federal Rules of Civil Procedure 16(b) and 26(f), the parties propose the following pre-trial schedule:
  - a. Initial Disclosures - Initial disclosures required by Federal Rules of Civil Procedure 26(a)(1) must be completed by August 25, 2005.
  - b. Amendments to Pleadings - Except for good cause shown, no motions seeking leave to add new parties or to amend the pleadings to assert new claims or defenses may be filed after September 15, 2005.
  - c. Fact Discovery/Interim Deadlines
    1. All requests for Production of Documents and Interrogatories must be served by October 3, 2005.
    2. All requests for Admissions must be served by January 16, 2006.
    3. All depositions, other than expert depositions, must be completed by December 15, 2005.

- d. Fact Discovery/Final Deadline - All discovery, other than expert discovery, must be completed by March 1, 2006.
- e. Status Conference - A Status Conference will be held on March 16, 2006.
- f. Expert Discovery
  - 1. Plaintiff's trial experts must be designated, and the information contemplated by Federal Rules of Civil Procedure 26(a)(2) must be disclosed, by April 3, 2006.
  - 2. Plaintiff's trial experts must be deposed by May 8, 2006.
  - 3. Defendants' trial experts must be designated, and the information contemplated by Federal Rules of Civil Procedure 26(a)(2) must be disclosed, by May 22, 2006.
  - 4. Defendants' trial experts must be deposed by June 23, 2006.
- g. Dispositive Motions
  - 1. Dispositive motions, such as Motions for Summary Judgment or Partial Summary Judgment and Motions for Judgment on the pleadings, must be filed by July 31, 2006.
  - 2. Oppositions to dispositive motions must be filed within 21 days after service of the motion.
- h. Pre-Trial Conference - A Pre-Trial Conference will be held on September 8, 2006.

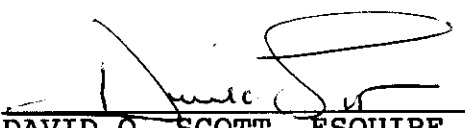
Respectfully Submitted,  
Defendant Union,  
By Its Attorney,

 (JFM)

JOHN F. McMAHON, ESQUIRE  
ANGOFF, GOLDMAN, MANNING  
B.B.O. NO. 338360  
45 BROMFIELD ST., 8TH FLOOR  
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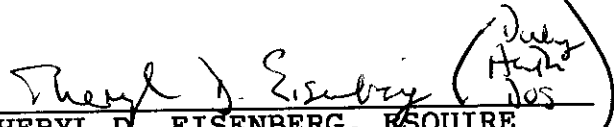
DATED June 23, 2005

Respectfully Submitted,  
The Plaintiff,  
By His Attorney,

  
DAVID O. SCOTT, ESQUIRE  
LAW OFFICE OF DAVID O. SCOTT, P.C.  
B.B.O. NO. 449165  
200 CHAUNCY STREET  
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DATED June 23, 2005

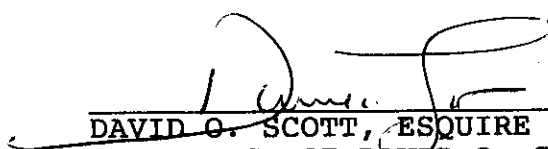
Respectfully Submitted,  
Defendant MIT-Lincoln Lab,  
By Its Attorney,

  
SHERYL D. EISENBERG, ESQUIRE  
SULLIVAN, WEINSTEIN & McQUAY  
B.B.O. NO. 641304  
TWO PARK PLAZA  
BOSTON, MASSACHUSETTS 02110-3902  
TELEPHONE (617) 348-4300

DATED June 13, 2005

CERTIFICATE OF SERVICE

I, David O. Scott, attorney for the Plaintiff in the above-entitled matter, do hereby certify that I have, this day, forwarded a copy of the foregoing motion, by first class mail, postage prepaid, to the following attorneys of record: John F. McMahon, Esquire and E. David Wanger, Esquire, Angoff, Goldman, Manning, Wanger & Hynes, P.C., 45 Bromfield Street, 8th Floor, Boston, Massachusetts 02108; and to Sheryl D. Eisenberg, Esquire, Sullivan, Weinstein & McQuay, Two Park Plaza, Boston, Massachusetts 02116-3901.

  
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DATED June 23, 2005